ADDENDUM TO THE FACT SHEET FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT NO. WA-005047-5

I. GENERAL INFORMATION

Kittitas County Water District #6 PO Box 71 Vantage, WA 98950

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on October 3, 2005, and accepted by the Department on October 10, 2005. Prior to making a determination whether to reauthorize an existing permit or conduct a full renewal, a thorough review of the permit and compliance history of the facility is conducted. This review shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the Permittee's waste treatment practices; nature, content, and frequencies of Permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee;
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.

The application for the Kittitas County Water District #6 and discharge monitoring reports (DMRs) were reviewed and they indicate no change in the treatment characteristics of the effluent process or increases in volume of wastewater have occurred.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to the Kittitas County Water District #6 for the discharge of wastewater to the Columbia River. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

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The fact sheet and application list no existing or proposed industrial users of the POTW.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet adequately addressed conditions and issues at the facility at the time when the previous permit was issued. The Department has not received any information during the course of the previous permit term indicating environmental impacts from the discharge were overlooked. Nor have incidents severe enough to undertake a complete renewal of the permit occurred during that time period.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five year permit.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The Permittee is required to submit for approval a residual solids management plan and to adhere to the approved plan during the course of the permit term.

There are no changes necessary to the previous discharge limitations based on the data contained in following tables. The Permittee will be required to continue with routine I & I and Wasteload Assessments during the course of the next permit.

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Table 1 compares the influent and effluent characterizations as reported this permit term from January 2002 to November 2005 with the Design Criteria and Permit Limitations.

Table 1
Influent/Effluent Characterization Compared to STP Design Criteria and Permit Limits

Influent Parameter	Design Criteria or Permit Limit	Monthly Averages ¹		Max, Min ²	
		Previous Permit	2002-2005	Previous Permit	2002-2005
BOD ₅ , mg/L	NA	177	138	280 (max)	254.1 (max) ³
BOD ₅ , lbs/Day ¹	175		15.6		36.5 (max) ⁴
TSS, mg/L	NA	118	91.7	200 (max)	190 (max) ⁵
TSS, lbs/Day	175		10.5		33.3 (max) ⁶
Effluent Parameter		Monthly Averages		Max, Min	
BOD ₅ , mg/L	30 /45	20	8.8	31 (max)	18.8 (max) ⁷
BOD ₅ , lbs/Day	22/33		1.02		3.25 (max) ⁸
TSS, mg/L	30 /45	8.2	4.7	38 (max)	11.4 (max) ⁹
TSS, lbs/Day	22/33		0.72		1.5 (max)
pH, Std. Units	6-9	NA	NA	6.6 (min) 8.5 (max)	5.3 (min) 8.2 (max
Temp., °C		17.3	16.7	28 (max)	26 (max)
DO, mg/L		6.4	5.4	0.74 (min)	0.7 (min)
Fecal Coliform, col/100 ml	200/400	13	9.1	170 (max)	75 (max) 10
Flow, mgd	0.087	0.013	0.014	0.105 (max)	0.03 (max)

NA means Not Applicable

The Permittee has been in substantial compliance with the permit requirements in recent years. In all, there was one month, May 2005, in which samples were not taken, for one of the required three times weekly sampling events. The missed samples were for influent

¹Monthly average value based on the 47 month frame from January 2002 to November 2005.

² Maximum Monthly Average and Minimum are derived from the 47 month timeframe from January 2002 to November 2005.

³ Highest value occurred September 2005.

⁴ Highest value occurred August 2002.

⁵ Highest value occurred July 2004.

⁶ Highest value occurred July 2004.

⁷ Highest values occurred July 2003.

⁸ Highest value occurred March 2005.

⁹ Highest value occurred August 2003.

¹⁰ Highest value occurred June 2003.

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pH and Temperature and effluent pH and Dissolved Oxygen. The Permittee received six violation of effluent pH, which was the result of a faulty pH probe. The Permittee also received four violations for late submittal of the Discharge Monitoring Report (DMR) one to two days past the deadline. The new permit shells have changed the submittal requirement and now state a DMR is not late as long as it is postmarked by the fifteenth of the month. This represents a change which would have eliminated the Permittee's past submittal violations. The new permit will contain the new permit shell language. The previous permit required an update to the O & M Manual, which is currently in the review process at the Department. The Department feels that the violations that have occurred are minor or have been corrected during the existing permit cycle and therefore do not warrant a complete rewrite of the permit.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A - <u>Public Involvement</u> for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix B - Response to Comments.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be reauthorized for five years.

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APPENDIX A -- PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

The Department published a Public Notice of Application and Draft (PNOA/D) on March 1, 2006 in the Ellensburg Daily Record to inform the public that an application, draft reauthorization permit, fact sheet addendum, and fact sheet were available for review. Interested persons are invited to submit written comments regarding the reauthorization of this permit. The draft reauthorization permit, fact sheet addendum, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator Department of Ecology Central Regional Office 15 West Yakima Avenue, Suite 200 Yakima, WA 98902

Any interested party may comment on the draft reauthorization permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft reauthorization permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (509) 457-7105, or by writing to the address listed above.

This Addendum to the fact sheet and the proposed permit were written by Richard Marcley.

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APPENDIX B -- RESPONSE TO COMMENTS

No comments were received by the Department of Ecology.